

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO  
and KARL LEIBINGER, on behalf of  
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA BANK BELGIUM (formerly known as  
ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware  
Corporation, STONINGTON CAPITAL  
APPRECIATION 1994 FUND L.P., a Delaware  
Partnership and STONINGTON HOLDINGS,  
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE  
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,  
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

### **DECLARATION OF KARA MORROW**

I, Kara Morrow, declare and state as follows:

1. I am an attorney associated with Clifford Chance US LLP and admitted *pro hac vice* to practice before this Court. I submit this declaration in support of Dexia Bank Belgium's Motion to Suspend Scheduling Order Deadlines Pending Resolution of Dexia's Motion to Dismiss and Various Discovery Motions.

2. Attached hereto as Exhibit A is a true and correct copy of the Amended Scheduling Order, dated December 27, 2005.

3. Attached hereto as Exhibit B is a true and correct copy of a letter from Jeff Butler to Susan Davies, dated September 30, 2005.

4. Attached hereto as Exhibit C is a true and correct copy of the Stipulation Pursuant to Federal Rule of Civil Procedure 15, dated March 29, 2006.

5. As counsel for Dexia Bank Belgium, we met and conferred with counsel for Plaintiffs concerning this issue on May 9, 2006, and were unable to come to any agreement. In attendance were Jeff Butler and Maryana Kodner on behalf of Dexia; Steve Singer on behalf of

Stonington Plaintiffs; Susan Davies on behalf of TRA Rights Trust; Patrick Rocco on behalf of Class Plaintiffs; and Karen Dyer on behalf of the Baker Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
May 22, 2006

  
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Kara Morrow